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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' OPPOSITION TO META'S
PROPOSED REDACTIONS TO THE
COURT'S DECEMBER 20, 2024
DISCOVERY ORDER [DKT. 351]**

Plaintiffs respectfully submit this opposition to Defendant Meta Platforms, Inc.’s proposed redactions to the Court’s December 20, 2024 Discovery Order (Dkt. No. 364) (“Proposed Redactions”). Meta’s heavy-handed redactions to a discovery order do nothing to protect Meta’s commercially sensitive business information, but instead merely continue the troubling pattern of redacting all references to the methods Meta used to download and distribute pirated works from third-party datasets, as well as all references to the specific datasets Meta downloaded. Plaintiffs have already confronted this recurring over-redaction in opposition to a prior Administrative Motion to File Under Seal, which is pending. *See* Dkt. No. 342. To briefly reiterate, mere references to methods of downloading and distributing copyrighted works (including Plaintiffs’), and identification of pirated datasets, in no way harm Meta’s competitive position. Instead, Meta seeks to seal them because their disclosure “may lead to [Meta]’s embarrassment,” which is not sufficient to justify sealing. *E.g., Kamakana v. City and County of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006).

The Proposed Redactions also seek to redact highly generalized references to a business decision that Meta made in April 2023. *See* Dkt. No. 364-1 at 5-6. The mere reference to that 20-month-old business decision does nothing to disadvantage Meta’s competitive standing. *See, e.g., Stirratt v. Uber Technologies, Inc.*, 2024 WL 1723710, at *7 (N.D. Cal. Apr. 19, 2024) (denying motion to seal “high-level descriptions [that] do not reveal legal and regulatory analyses or confidential business strategy”). Indeed, Meta does not seek to redact the heading in § (D)(2) of the Court’s Order, which involves the ***very same decision*** that Meta later attempts to redact in the body of the Order. Accordingly, the Court should reject the Proposed Redactions in their entirety.

Dated: December 27, 2024

By: /s/ Maxwell V. Pritt
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